

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

Grace D. Solis and  
Shirley J. Solis  
Plaintiffs

FILED BY *[Signature]* D.C.

MAR - 6 2025

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - MIAMI

v.

Case No. 24-21356-KMW

CITIBANK, N.A.,  
CENLAR SERVICING,  
ROBERTSON, ANSCHUTZ, SCHNEID, CRANE & PARTNERS, LLC, and;  
Kim Stevens  
Defendants

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO PRODUCE FACT WITNESS LIST**

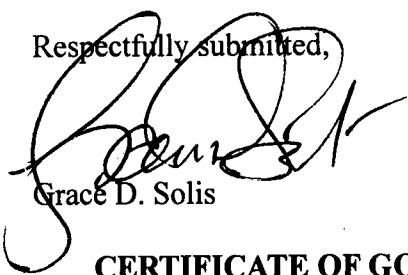
The Plaintiffs, Grace D. Solis and Shirley J. Solis, *pro se*, file their Motion for Extension of Time to Provide Fact Witness List as ordered by this Court and as grounds therefore states:

1. This Court provided a Scheduling Order dated February 6, 2025.
2. The Plaintiffs do not have contact information for their witnesses and have requested them from the Defendants. The Defendants provided partial contact information in the state case on or about April 6, 2024. The Plaintiffs do not know if that information is current and still need the contact information for the remaining witnesses.
3. The Defendants do not want to provide contact information because they want a ruling on their Motion to Dismiss. They said that we are seeking discovery in this case, and they object.
4. The Defendants state that we cannot relitigate a state court case in Federal Court even though this case was filed before there was a judgment in the state case.
5. This case is about the abuse and deception conducted by the Defendants against the Plaintiffs in violation of the FDCPA, the FCCPA, and their refusal to provide contact information to depose the witnesses, which materially affected the outcome of the trial in state court.

WHEREFORE, the Plaintiffs respectfully move the court to enter an order granting Plaintiff's

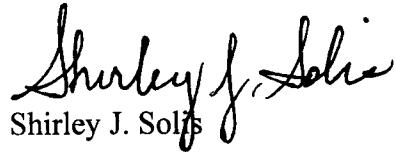
Motion for Extension of Time to Produce Fact Witness List and any other remedies this Court deems just and proper.

Respectfully submitted,



Grace D. Solis

March 3, 2025



Shirley J. Solis

**CERTIFICATE OF GOOD FAITH CONFERENCE; CONFERRED BUT UNABLE TO  
RESOLVE ISSUES PRESENTED IN THE MOTION**

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that Plaintiffs have conferred with all parties or non-parties who may be affected by the relief sought in this motion in a good faith effort to resolve the issues but has been unable to resolve the issues.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been delivered by USPS to:

Counsel for the Defendants  
Adams and Reese LLP  
101 E. Kennedy Blvd., Ste. 4000  
Tampa, FL 33602

Robertson, Anschutz, Schneid, Crane & Partners, LLC  
6409 Congress Avenue, Suite 100  
Boca Raton, FL 33487

**CERTIFIED MAIL®**



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400 N. Miami Ave, # 8th Fl/300  
Miami, FL 33128

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Retali

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D.C.

MAR - 6 2025
ANGELA E. NOBLE
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730 8th St  
Miami Beach, FL 33141